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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON SUSCRIBING TO CERTIFICATE
NO. V588122,

Plaintiff,

v.

ELIZABETH PAMI, an individual; NANCY
JEAN MARTINEZ, an individual;

Defendants.

Case No.: 2:20-cv-02168-RFB-BNW

**STIPULATION AND ORDER
EXTENDING THE TIME FOR
DEFENDANTS TO FILE RESPONSE TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT**

(First Request)

Plaintiff and Defendants, by and through their undersigned counsel, state the following:

1. Plaintiff's Motion for Summary Judgment was filed on July 09, 2021. (ECF No. 29.

2. The current deadline for Defendants to file their response is July 30, 2021.

3. Defendants' counsel are seeking an approximate thirty (30) day extension to file their Responses.

4. The parties agree to extend the date for Defendants to file their Responses from July 30, 2021 to **August 31, 2021**.

5. Good cause exists this extension of time. The parties are actively attempting to resolve both the underlying state court litigation and the coverage litigation that is pending before this Court. Mediation has occurred with the Hon. David Barker, and additional efforts are being made to resolve any remaining issues that are being negotiated. The parties are

cautiously optimistic that the litigation will be resolved in its entirety. This extension is being sought in good faith, for good cause and not for the purposes of undue delay.

IT IS SO AGREED AND STIPULATED:

**COCHRAN, DAVIS &
ASSOCIATES, P.C.**

SANTORO WHITMIRE

/s/ Lisa Hansen

/s/ James E. Whitmire

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Attorneys for Defendant Nancy Jean Martinez

IT IS SO ORDERED:



RICHARD E. BOULWARE, II
United States District Court

DATED this 29th day of July, 2021.